BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Promote Policy and Program Coordination and Integration in Electric Utility Resource Planning	Rulemaking 04-04-003
Order Instituting Rulemaking to Promote Consistency in Methodology and Input Assumptions in Commission Applications of Short-run and Long-run Avoided Costs, Including Pricing for Qualifying Facilities.	Rulemaking 04-04-025

REPLY OF THE UTILITY REFORM NETWORK TO COMMENTS

ON THE PROPOSED DECISION OF ALJ HALLIGAN

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TABLE OF CONTENTS

REPLY OF TURN TO COMMENTS ON THE PROPOSED DECISION

Pursuant to Article 14 of the Commission's Rules of Practice and Procedure, The Utility Reform Network (TURN) hereby submits this reply to the May 25 opening comments filed by the other active parties on the Proposed Decision (PD) of Administrative Law Judge (ALJ) Halligan regarding pricing and contracting for Qualifying Facilities (QFs) in California.

I. Response to the IOUs and DRA on Issues Raised in TURN's Opening Comments

The opening comments of the three Investor-Owned Utilities (IOUs) and the Division of Ratepayer Advocates (DRA) raise many of the same concerns that TURN discussed in its opening comments. All of these parties point out the ***double counting of variable O&M expenses*** that results from the PD's possibly inadvertent modification to the Edison-proposed SRAC formula, as shown in the footnotes to Table 4. Edison and SDG&E would solve this problem by restoring the implied market heat rate *adjustment* for variable O&M initially proposed by Edison (and apparently approved by the text of the PD), while PG&E and DRA would simply drop the O&M *adder* from the new MIF formula. Either of these approaches would solve the double counting problem, but TURN believes that the Edison/SDG&E approach is more consistent with the text of the PD and produces a better result, by employing an explicit variable O&M factor that is not tied to changes in the price of gas.

All of these parties also identify similar problems with the firm and as-available capacity payments set forth in the PD. TURN specifically agrees with SDG&E that ***the as-available capacity payment should be corrected*** (reduced) by incorporating appropriate adjustments to recognize the net energy and ancillary services revenues that the "avoided" combustion turbine (CT) would otherwise earn in the market. Since as-available QFs do not provide these same benefits as a modern CT, their capacity payment should only equal the *net* capacity cost of a CT, *after* deducting the market revenues that an actual CT would generate. TURN also agrees with PG&E and Edison that the as-available capacity payment should be reduced to zero if, at some point in the future, as-available QF power no longer counts for Resource Adequacy (RA) purposes. If that were to occur, the utilities would be required to purchase RA-qualified capacity somewhere else, and the QFs would no longer be allowing the utilities to avoid those costs.

TURN takes exception to the comments of CAC (p.23), which argue for the *elimination* of the ancillary services deduction proposed by SDG&E (and partially adopted in the PD). If the "avoided" CT were actually built or purchased by the utility, it would provide RA capacity benefits *at all times*, as well as net energy value whenever the implied market heat rate exceeds the actual heat rate of the CT unit, plus non-spinning reserve Ancillary Service (AS) value at other times. An as-available QF, on the other hand, provides only energy valued at whatever the implied market heat rate actually is (no net energy savings), plus RA value to the extent that its capacity counts for RA purposes (currently based on historical performance during peak periods). The QF provides no AS value to the utility, and is therefore less valuable than the actual CT that is displaces. That reduced value must be reflected in the price paid to the as-available QF, or else its pricing will exceed the utility's avoided cost.

The IOUs and DRA similarly agree that **the MPR-based firm capacity payment** should be adjusted to reflect a deduction for the net energy value that a real combined cycle gas turbine (CCGT) would produce, due to its favorable heat rate. Edison and SDG&E each proposed such a calculation, while PG&E and DRA only raised the general point. While TURN agrees in concept, we submit that the better means of reflecting the real economics of the avoided CCGT would be to pay firm QFs the *full* CCGT capacity value, along with a *fixed heat rate* for their energy output that is based on the average heat rate of the CCGT proxy unit used to establish the MPR capacity value. This is consistent with the fixed heat rate recommendation of CAC (pp.7-8), except that CAC proposes a 7500 MMBTU/kWh heat rate, which significantly exceeds the 6918 MMBTU/kWh average heat rate adopted in the MPR calculation.[1]

II. Response to the QF Parties on Issues Raised in TURN's Opening Comments

TURN takes strong exception to the comments filed by the QF Parties, to the extent that they argue for an SRAC heat rate *higher* than the implied market heat rate adopted in the PD. Contrary to some of the QF Party comments, the current day-ahead energy market is NOT a "dump" market for "economy energy" similar to the daily spot market that existed prior to industry restructuring. The product traded in the day-ahead market today is firm (liquidated damages – "LD") energy, for which the buyer has recourse in the event of non-delivery. That product, plus an unbundled RA capacity product, is all that Load Serving Entities (LSEs) such as

[1] *If and only if* the Commission adopts the 6918 MPR heat rate for firm QFs, as TURN has advocated, then TURN could support the CCC recommendation (p.24) to increase the firm capacity payment from $104 per kW-yr to $118. But even the $104 capacity payment would be too high if the firm QF were allowed to sell its energy at the implied *market* heat rate (SRAC), which significantly exceeds the heat rate of the proxy CCGT unit on which the $104/$118 capacity payment was based.

the IOUs need to purchase in order to meet their procurement obligations. Thus, day-ahead energy plus RA capacity equals the full value of the IOUs' avoided costs of QF power.

CCC's comments complain at length about "out-of-market" RMR and MOO dispatches by the CAISO, and assert that those costs should somehow be reflected in SRAC payments. To the contrary, such "reliability must run" units were *always* reflected in the computer model runs used to calculate the Incremental Energy Rate (IER) for QF pricing purposes historically, and their inclusion had the very same effect -- reducing the IER -- as RMR and MOO units have on the market price of electricity today. That effect is therefore nothing new, and nothing that this Commission needs to correct.[2] Moreover, CCC proves too much with its argument that: "Generators do not expect to recover their costs through NP- 15/SP-15 Prices, but instead can make up the "missing money" through their RA contracts" (p.5). While the statement itself is true, those RA contracts are subject to a maximum $40 per kW-yr "waiver trigger," as described in TURN's opening comments. Thus, RA contracts earn generators *far less* than the capacity payments advocated by CCC in this case. CCC doesn't just want the "missing money;" it wants a whole lot more!

Finally, CCC errs in its attempt to equate the "elasticity factor" developed by E3 for inclusion in the cost-effectiveness analysis of energy efficiency programs with its request for an upward adjustment to QF energy payments (pp.8-9). When *customers* reduce their energy usage through increased end use efficiency, they benefit *both* directly from their reduced consumption *and* indirectly from the reduction in market prices that comes with reduced demand. Thus, it is appropriate to consider both effects in evaluating the cost-effectiveness of a proposed energy efficiency program that will be funded by those customers. In contrast, when a supplier (QF or otherwise) adds more supply to the market, there will indeed be some downward pressure on the market price, but no supplier in any market anywhere is able to capture the value of what that market price "would have been" absent that supplier's presence in the market. What the CCC position really translates to is an argument that "if I withheld my supply from the market then prices would be higher, so you should pay me that higher price in order to get me to produce." But that is not avoided cost pricing, rather it is a reflection of *monopoly* pricing, which surely was not the intent of PURPA.

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[2] It should also be noted that the Commission's implementation of its RA program has dramatically reduced the CAISO's reliance on RMR and MOO dispatches.

CCC also argues, at page 13, that this Commission should not attempt to lower SRAC energy payments below avoided cost in order to compensate for current QF contract capacity payments that are above market. In principle TURN agrees with this statement, and we have not argued that this Commission should *artificially* reduce SRAC for this reason (although we do advocate a lower SRAC than that proposed by CCC). TURN must point out, however, that to the extent that capacity prices in legacy QF contracts are above the current value of capacity in the market, such payments will have the effect of cushioning those QFs against the *impact* of reducing SRAC to reflect today's market price of energy. We make this point NOT to suggest that SRAC should be set *below* true avoided cost, but rather to emphasize that any QFs that claim they will not to be able to survive on their current capacity payments plus the revised SRAC adopted in the PD must be very inefficient indeed, since their *total* payments will still exceed the utilities' avoided costs until the current contractual capacity payments expire.

IEP asserts, at pages 7-8, that the "approved MIF invites price manipulation by the purchasing utilities," and complains that the PD fails to address its arguments in any detail. In fact, the types of potential "manipulation" that IEP cites are already barred by other rules and regulations. For example, this Commission's requirement that the IOUs follow the principles of least-cost dispatch would preclude the utilities from "substituting higher-cost retained generation or purchased energy for energy that would otherwise be purchased" from the market. Any IOU that attempted to do this would be in violation of the least-cost dispatch rule. Similarly, alleged utility under-scheduling of load is no longer possible given the CAISO's 95% day-ahead scheduling requirement. The PD is therefore correct in dismissing concerns about alleged IOU market manipulation, because any such actions are already prohibited by other effective rules.

III. TURN Supports the QFs on Some Issues

TURN does see merit in some of the issues raised by the QF Parties. For example, CCC's detailed descriptions of how burner tip gas prices should be derived (Appendix C to the CCC comments) are reasonable and should be adopted. In particular, TURN agrees with CCC that "PG&E City Gate" gas prices should be used in lieu of an arbitrary 50/50 average of border prices at Malin and Topock. The PG&E City Gate is a more liquid trading point, and its use would eliminate the concerns raised by IEP (p.9) about which PG&E backbone transmission rate to assume in the burner tip price calculation. Adoption of the detailed CCC recommendations on gas prices would also clarify several of the other ambiguities identified by IEP on page 9.

Likewise, TURN tends to agree with the comments of CAC, CCC and IEP regarding their concerns with the "heat rate collar" element of the Edison SRAC proposal. Given that the adopted formula already relies upon a rolling *12-month average* implied market heat rate, it is not clear to TURN that the "collar" is necessary to mitigate volatility in the SRAC price. TURN submits that the issues of whether or not a collar (or a "cap and floor") is needed and, if so, what it should be, would best be deferred to the post-decision workshop that we recommended in our opening comments. Pending the results of that workshop, TURN believes that no collar needs to be included in the SRAC calculation for the time being.

TURN further agrees with CAC (pp.13-14) that it would be reasonable to modify the PD to make it clear that QF projects of 25 MW or less that consume at least 25% of their power internally, and sell all of their additional output to the utility, should be eligible for longer-term contracts without passing an "over-subscription" test. Such projects cannot effectively participate in CAISO markets due to various CAISO rules, and as long as their "put option" to the utility is limited in size, the system should be able to accommodate these relatively small as-available deliveries without too much difficulty. We also do not object to CAC's proposal to modify the MW limit originally proposed by TURN such that it would be stated as an annual GWh limit, rather than as a capacity limit. However, in that case TURN would recommend a slightly lower limit, equal to **20** MW x 8760 x .75, or 131.4 GWh.

CAC also recommends (p.10) that the new contract forms for QFs allow for increases to the capacity amount stated in the contract (and compensation for that capacity) if the increase is accomplished "in the normal course of business," as that term is defined in Public Utilities Code Section 371. TURN could support that proposal *if and only if* the recommendations in our opening comments on necessary adjustments to the SRAC and capacity pricing set forth in the PD are adopted. As long as the prices paid to QFs do not exceed the utilities' avoided costs, there should be no harm in allowing these limited increases in project capacity to be paid for under the contract terms.[3] On the other hand, if the Commission's decision allows for continued above-market payments to QFs under new contracts, such incidental capacity increases would increase the burden on ratepayers and would have to be negotiated with the purchasing utility.

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[3] This assumes that the projects in question are compliant with GHG requirements, as set forth in SB 1368 and D.07-01-039.

IV. Many Parties Agree that the PD Lacks Sufficient Detail on Certain Issues

In our opening comments, TURN suggested that the Commission provide for a post-decision implementation workshop to address certain more detailed issues that were not clearly resolved in the PD. Many of the parties raise similar concerns, and some even propose a form of workshop process to address areas of ambiguity or lack of resolution in the PD.

For example, virtually every commenting party expressed concerns about the PD's discussion of "Time-of-Use Periods and Factors." That issue is clearly one that would benefit from workshop discussions among the active parties, and could very well be resolved in that forum on a consensus basis. The same may be true with respect to the *process* for updating the various components of the capacity and energy prices adopted in the PD. Likewise, if the "heat rate collar" element is removed from the SRAC formula for the time being, as suggested above, the parties could also address that issue in the workshop.

IEP's comments (pp.8-11) included a fairly lengthy list of issues that were not clearly resolved by the PD, at least from that party's perspective. Without commenting on each and every specific item on IEP's list, TURN agrees that many of these issues should either be addressed in the PD, as discussed above, or deferred to the workshop process.

V. Any Workshop Process Should Not Delay Implementation of the Decision

While TURN believes that a workshop process would be quite helpful in resolving a number of detailed implementation issues, we cannot support CAC's proposal (pp.15-16) that implementation of *the entire decision* be delayed until such a process is completed. In TURN's view, the issues that may remain open after the Commission renders its decision here – possible changes to TOU/TOD periods and factors, protocols for updating of payments in future years, potential use of a heat rate "collar," and the terms of any *new* contracts -- are not essential to the *current* implementation of the SRAC and as-available capacity payment changes that would be adopted in the PD.

While CAC is clearly concerned that the IOUs may attempt to delay the availability of the new standard contracts approved in the PD, TURN believes that there is even greater grounds for concern that the QFs would seek to delay the resolution of any workshop issues in order to postpone any reduction in their SRAC payments for as long as possible. Since the PD is clear in its conclusion that the current formula must be changed in order to limit future SRAC payments to the utilities' true avoided costs, it would be unfair to consumers (and possibly even illegal) to delay implementation of those necessary changes while the detailed terms of the *new* QF contracts are being worked out. Thus, while TURN agrees with CAC that the workshop process and development of the new contract forms should proceed expeditiously, and with no tolerance for unnecessary stalling tactics, we cannot support an indefinite delay to the necessary near-term pricing changes that the PD would require.

VI. TURN Agrees with DRA that a New "QF Gold Rush" Must Be Avoided

At page 3 of its comments, DRA raises a very important point regarding the execution of the new QF contracts authorized in the PD:

> In addition, the establishment of new standard offers could result in a repeat of the events of the mid-1980's where hundreds of projects totaling over 10,000 MW of capacity signed contracts in the span of a few weeks, referred to as the "QF gold rush," thereby burdening utilities and ratepayers with much more power than was needed or economic at the time. If the Commission is going to resurrect standard offer contracts, it must also ensure that a reoccurrence of the gold rush does not take place. One simple means is to ***specify that a contract is not considered to have been executed and legally binding unless it has been signed by both the QF and the utility***. By contrast, in the 1980's, the QF's signature alone was required to execute a standard offer contract. This significantly limited the ability of utilities and other parties to prevent the oversubscription of those contracts. (emphasis added)

TURN fully agrees with DRA on this point. While we believe that it was not the PD's intent to authorize a "standard offer" contract such as those made available in the 1980's that required *only* the signature of the QF and *not* the utility to become binding, that point must be made unequivocally clear in the Commission's final decision. The utilities should be required to promptly enter into contracts in those situations that have been authorized and approved by the Commission, but "automatic" contract effectiveness upon signature by the QF has proven to be a very bad idea that must not be repeated.

Similarly, TURN agrees with Edison that there must be greater definition to the concept of "expiring" contracts, as that term is used in the PD. *Every* existing QF contract will expire at some point, and thus every such QF could argue that is has an "expiring" contract, and thus seek to sign up for an additional ten-year term, even if its contract does not expire for a number of years. Therefore, TURN agrees with Edison (p.5) that new contracts should *only* be available to those existing QFs whose current contracts will expire within a rolling 24-month window, and to new QFs that will come online within a rolling 36-month window.

VII. There Must Be Some Upper Limit on the Size of New QF Contracts

PG&E's comments point out a very disturbing potential problem that this Commission must address in its decision here. At page 12, the utility reports that Calpine's Los Medanos Energy Center, which was constructed as a merchant plant, self-certified with FERC last year as a 550 MW qualifying cogeneration facility. The PD could not seriously have intended that such a large facility, which has never been under a QF contract in the past, should be eligible for one of the new QF contract forms. While TURN has proposed a much smaller maximum size limit for any new "standard" QF contracts, this Commission must at least require new projects over 50 MW in size (except those selling only a limited amount of energy that is excess to their own internal usage, as discussed above) to participate in the market through utility solicitations or bilateral negotiations, on the same basis as other large generators. No good can come from providing standard QF contracts to units such as Los Medanos, yet that could easily be the result if the PD is not modified to include some form of maximum size limit.

VIII. This Commission Has a Legal Duty to Address Retroactivity

Edison's comments (pp.18-19) correctly point out that, under the applicable appellate court decisions, this Commission has a legal duty to adjust past QF payments that exceeded the utilities' avoided costs. There is an abundant record in this proceeding demonstrating that the current SRAC formula has produced QF prices in excess of the utilities' avoided costs for at least the past few years. This Commission cannot simply brush aside this issue by asserting it "has generally declined to make retroactive downward adjustments." While true, that assertion does not acknowledge the court's mandate on this issue.

IX. Conclusion

TURN generally supports the PD. However, the PD must be modified to correct the errors identified above, and in our opening comments

Respectfully submitted,

THE UTILITY REFORM NETWORK

June 4, 2007

By: __________/S/_____________________

Michel Peter Florio
Senior Attorney

<u>CERTIFICATE OF SERVICE</u>

I, Larry Wong, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

On June 4, 2007 I served the attached:

REPLY OF THE UTILITY REFORM NETWORK TO COMMENTS ON THE PROPOSED DECISION OF ALJ HALLIGAN

on all eligible parties on the attached lists to **R.04.04.003**, by sending said document by electronic mail to each of the parties via electronic mail, as reflected on the attached Service List.

Executed this June 4, 2007, at San Francisco, California.

______/S/__________

Larry Wong

CALIFORNIA PUBLIC UTILITIES COMMISSION
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Top of Page
Back to INDEX OF SERVICE LISTS